

### REMARKS

This application has been reviewed in light of the Office Action dated April 29, 2009. Claims 38 and 40-44 are presented for examination, of which Claims 38 and 40 are in independent form. Claims 27-37, 39, and 45-60 have been withdrawn from consideration. Claims 38 and 40 to 44 have been amended to define more clearly what Applicants regard as their invention.<sup>1</sup> Favorable consideration is requested.

Claims 38 and 40-44 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,175,201 (*Sid*). Applicants submit that independent Claims 38 and 40, together with the claims dependent therefrom, are patentably distinct from the cited art for at least the following reasons.

Claim 38 is directed to a lamp operating device arranged to operate a lamp, the lamp operating device being operable in one of a plurality of operational modes selectable by a central control unit. The lamp operating device is also arranged to interpret commands provided by a local control unit, based on the available operational mode selected by the central control unit, to control the lamp.

Among other features of Claim 38 is that the lamp operating device is arranged to interpret commands provided by a local control unit, based on the available operational mode selected by a central control unit, to control the lamp. By virtue of this feature, the lamp operating device can be controlled by a local control unit in the operational mode selected by a central control unit.

---

<sup>1</sup>/Support for the amendments to the independent claims can be found at, e.g., page 5, lines 14 to 16, page 9, lines 5 to 19, and page 10, lines 4 to 10.

Applicants submit that nothing has been found in *Sid* that discloses or suggests the noted reactions of Claim 38. Apparently *Sid* relates to a method of setting the address of control devices that control lighting devices, such as lamps. *Sid* discusses a DMX controller 200 and addressable devices 210, 212, 214, and 216, where those devices have control buttons 51-55 (see, e.g., *Sid*, at column 4, lines 8-24 and Figs. 1 and 4). Apparently, using the control buttons 51-55, or control buttons 91-95 on a remote control unit 90 (*Sid*, Fig. 3), the devices 210, 212, 214, and 216 can be switched between an operating mode and a programming mode (see, e.g., column 4, lines 57-63, and column 5, lines 9-15). However, nothing has been found in *Sid* that discloses or suggests "the lamp operating device also arranged to interpret commands provided by a local control unit, based on the available operational mode selected by the central control unit, to control the lamp", as recited in Claim 38.

Accordingly, Applicants submit that Claim 38 is allowable over *Sid*. Independent Claim 40 recites features similar to those discussed above with respect to Claim 38 and is believed to be patentable over *Sid* for at least the same reasons as discussed above in connection with Claim 38.

The other claims in this application depend from one or another of the independent claims discussed above, and, therefore, are submitted to be patentable over *Sid* for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100 or by facsimile at (212) 218-2200. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



---

Frank A. DeLucia  
Attorney for Applicants  
Registration No. 42,476

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

FCHS\_WS 3672071v1